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May 22, 2020

VIA ECF

Hon. Judge Lewis J. Liman.
United States District Court Judge
Southern District of New York
United States District Court
500 Pearl St., Room 15C
New York, NY 10007

Application GRANTED. Defendant shall respond to the Complaint no later than June 29, 2020. The Initial Pretrial Conference is RESET for July 7, 2020 at 2:30 p.m. It will proceed telephonically. Parties are directed to call (888) 251-2909 and use access code 2123101.

5/22/2020

Re: **Shael Cruz et al v. Rockwell Time Inc.**
No.: 1:20-cv-01902



LEWIS J. LIMAN
United States District Judge

Dear Judge Liman:

Counsel for Defendant Rockwell Time Inc. ("Defendant") in the above-referenced action respectfully requests a further extension of time to answer, move, or otherwise reply to Plaintiff's Complaint (ECF No. 1). This court issued an order making the current deadline to respond to the Complaint May 29, 2020. The parties are currently engaged in settlement discussions that may negate the necessity for a response to the Complaint. Therefore Defendant requests that the Court extend the time Defendant has to respond to the Complaint by thirty (30) days until June 29, 2020.

Defendant also requests that the Initial Pretrial Conference set for June 10, 2020 at 10:00 AM be continued to a later date that is convenient for the Court. No Case Management Plan or Scheduling Order has been issued in this case.

This is Defendant's second request for an extension in connection with this action. Plaintiff's counsel has consented to this request.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Kara M. Cormier
Kara M. Cormier

Cc: All counsel of record (via ECF)
Joshua Briones, Esq. (via email)
E. Crystal Lopez, Esq. (via email)